

FILED IN COMBINED COURTS
LARIMER COUNTY, CO

2016 SEP 16 PM 4:11

Small Claims County Court District Court
 Probate Court Juvenile Court Water Court

Larimer County, Colorado
Larimer County Justice Center
201 La Porte Ave
Suite 100
Ft. Collins, CO 80521

DATE FILED: September 16, 2016
CASE NUMBER: 2016CV144

Plaintiff: Virginia L. Farver

v

Defendant(s):

City of Fort Collins
Fort Collins City Council
Darin Atteberry
Fort Collins Utilities
Fort Collins Utilities Management and Staff
Dennis Sumner
Steve Catanach; and
Does 1 - 100

▲ COURT USE ONLY ▲

Case Number:

2016 CV 144

Div.: Ctrm:
Courtroom 5B

Attorney or Party Without Attorney: (Name & Address)

Virginia L. Farver
1214 Belleview Drive
Fort Collins, CO 80526

Phone Number: 970-689-3798

FAX Number:

E-mail:

Atty. Reg. #:

Plaintiff's Supplemental Rule 26 a 1 disclosures on documents

Plaintiff makes the following supplemental disclosures pursuant to C.R.C.P. Rule 26(a)(1).

Documents

That section says:

(1) Disclosures. Except to the extent otherwise directed by the court, a party shall, without awaiting a discovery request, provide to other parties the following information, whether or not supportive of the disclosing party's claims or defenses:

(B) a listing, together with a copy of, or a description by category, of the subject matter and location of all documents, data compilations, and tangible things in the possession, custody or control of the party that are relevant to the

claims and defenses of any party, making available for inspection and copying such documents and other evidentiary material, not privileged or protected from disclosure, as though a request for production of those documents had been served pursuant to C.R.C.P. 34;

Plaintiff will make available for inspection and copying the following documents. These documents are located in Plaintiff's file and / or on Plaintiff's computer. The categories of documents include:

#1 all of those documents that Plaintiff delivered to the City as part of her "notice and claim of injuries and damages related to the Advanced Metering Fort Collins project" (or "notice and claim") dated September 23, 2015 and hand delivered and mailed by certified mail to the City on that date, a copy of which was served on Defendants as part of the Complaint, and;

#2 all of the documents that Plaintiff served on the defendants as part of the Complaint; and

#3 the emails between Plaintiff and the City or any of its agents related to the AMFC Project and Plaintiff's Open Records Act request for the resolution / ordinance etc. authorizing the Project.

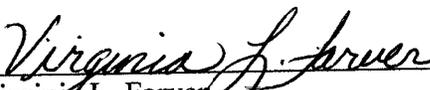
#4 Plaintiff's correspondence with the City about the health impacts of wireless radiation

#5 Plaintiff's correspondence with the City about the City's intention to remove the analog meter from her house and install a smart meter on it and Plaintiff's desire to keep her analog meter and not be required to have a smart meter, and about the option to receive an alternative meter if Plaintiff were to pay a manual meter reading charge.

The above described documents are all "in the possession, custody or control of the party [Plaintiff] that are relevant to the claims and defenses of any party". They are also in the possession, custody or control of the City.

Dated August 24, 2016

Respectfully submitted,


Virginia L. Farver

CERTIFICATE OF SERVICE

The undersigned hereby signifies that a true and correct copy of the foregoing Plaintiff's C.R.C.P. 26(a)(1) supplemental disclosures was served via email on this date the _____ day of August, 2016 on the following.

Kimberly Schutt
Wick and Trautwein, LLC
P.O. Box 2166
Fort Collins, Colorado 80522

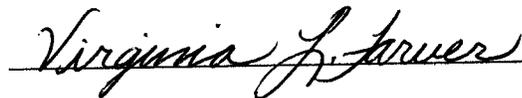
at her email address kschutt@wicklaw.com

and

John R. Duval
Fort Collins City Attorney's office
P.O. Box 580
Fort Collins, CO 80522

at his email address jduval@fcgov.com

Respectfully submitted,

A handwritten signature in cursive script, reading "Virginia L. Farver", is written over a horizontal line.

Virginia L. Farver